

Rita L. Hullett, Esq.
Admitted *Pro Hac Vice* [Doc. No. 3959]
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
1400 Wells Fargo Tower
420 20th Street N
Birmingham, AL 35203
Telephone: (205) 276-9807
Email: rhullett@bakerdonelson.com

Counsel for Geodis Logistics LLC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:

SEARS HOLDINGS CORPORATION, *et al.*

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF GEODIS LOGISTICS, LLC'S OBJECTION TO THE
PROPOSED CURE AMOUNTS IN CONNECTION WITH THE DEBTORS' PROPOSED
ASSUMPTION AND ASSIGNMENT OF CERTAIN LEASE
[Related to Doc. No. 3586]**

TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:

Geodis Logistics LLC (f/k/a OHL Acquisition Corporation d/b/a Ozburn - Hessey Logistics LLC) ("Geodis"), by its undersigned counsel, hereby withdraws its *Objection to the Proposed Cure Amounts in Connection with the Debtors' Proposed Assumption and Assignment of Certain Lease* [Doc. No. 3586].

Nothing herein is intended to be, or should be construed as, a waiver by Geodis of any of its rights under the Lease, the Bankruptcy Code, or applicable law. Geodis expressly reserves all such rights.

Dated: June 4, 2019

Respectfully submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

/s/ Rita L. Hullett

Rita L. Hullett
1400 Wells Fargo Tower
420 20th Street N
Birmingham, AL 35203
Telephone: (205) 276-9807
Email: rhullett@bakerdonelson.com

Counsel for Geodis Logistics LLC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of June, 2019, the annexed Objection was served on (i) the parties requesting ECF notifications via the Court's CM/ECF case notification system; (ii) the parties so indicated below *via* first class U.S. mail; (iii) the parties so indicated below *via* electronic mail; and (iv) on all other parties requesting notice pursuant to Rule 2002 and in accordance with this Court's Amended Order Implementing Certain Notice and Case Management Procedures entered on November 1, 2018.

/s/ Rita L. Hullett
Of Counsel

U.S. Mail

Chambers Copy

Chambers of the Honorable Judge Robert D. Drain
United States Bankruptcy Court for the S. D. of New York
300 Quarropas Street, Room 248
White Plains, NY 10601

Debtors

Sears Holdings Corporation
3333 Beverly Road
Hoffman Estates, IL 60179
Attn: Stephen Sitley Esq.
Luke J. Valentino, Esq.

Office of the United States Trustee

Office of the United States Trustee for Region 2
201 Varick Street, Suite 1006
New York, NY 10014
Attn: Paul Schwartzberg, Esq.

Electronic Service

Debtors

Rob Riecker - rob.riecker@searshc.com
Luke Valentino - luke.valentino@searshc.com
Mohsin Meghji - mmeghji@miiipartners.com

Counsel for the Debtors

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Ray C. Schrock, P.C.
Jacqueline Marcus, Esq.
Garret A. Fail, Esq.
Sunny Singh, Esq.

ray.schrock@weil.com
garrett.fail@weil.com
jacqueline.marcus@weil.com
sunny.singh@weil.com

**Attorneys for Bank of America, N.A., administrative agent under the
First Lien Credit Facility and the DIP ABL Agent**

Skadden, Arps, Slate, Meagher & Flom LLP

4 Times Square

New York, NY 10036

Attn: Paul D. Leake, Esq.

Shana A. Elberg, Esq.

George R. Howard, Esq.

paul.leake@skadden.com

shana.elberg@skadden.com

george.howard@skadden.com

Attorneys for Citibank, N.A., as administrative agent under the Stand-Alone L/C Facility

Davis Polk & Wardell LLP

450 Lexington Avenue

New York, NY 10017

Attn: Marshall S. Huebner, Esq.

Eli J. Vonnegut, Esq.

marshall.huebner@davispolk.com

eli.vonnegut@davispolk.com

**Attorneys for JPP, LLC, as agent under the Second Lien Credit Facility, IP/Ground Lease
Term Loan Facility, and the Consolidated Secured Loan Facility**

Cleary, Gottlieb

One Liberty Plaza

New York, NY 10006

Attn: Sean A. O'Neal, Esq.

soneal@cgsh.com

**Attorneys for Computershare Trust Company, N.A., as trustee for the Second Lien PIK
Notes, the Holdings Unsecured PIK Notes, and the Holdings Unsecured Notes**

Kelley Drye & Warren LLP

101 Park Avenue

New York, NY 10178

Attn: Eric R. Wilson, Esq.

Benjamin D. Feder, Esq.

T. Charlie Liu, Esq.

ewilson@kelleydrye.com

bfeder@kelleydrye.com

cliu@kelleydrye.com

Attorneys for Wilmington Trust, NA, as indenture trustee for the Second Lien Notes

Seyfarth Shaw, LLP
620 Eighth Avenue
New York, NY 10018
Attn: Edward M. Fox, Esq.
emfox@seyfarth.com

**Attorneys for The Bank of New York Mellon Trust Company, as successor trustee for the
SRAC Unsecured PIK Notes, SRAC Unsecured Notes, and the SRAC Medium Term Notes**
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10015
Attn: James Gadsden, Esq.
gadsden@clm.com

Attorneys for the Pension Benefit Guaranty Corporation
Locke Lord LLP
111 South Wacker Drive
Chicago, IL 60606
Attn: Brian A. Raynor, Esq.
braynor@lockelord.com

Attorneys for the Official Committee of Unsecured Creditors
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
Attn: Philip C. Dublin, Esq.
Ira Dizengoff, Esq.
Sara Lynne Brauner, Esq.
pdublin@akingump.com
idizengoff@akingump.com
sbrauner@akingump.com

Attorneys to Wells Fargo Bank, National Association
Choate, Hall & Stewart LLP
Two International Place
Boston, MA 02110
ksimard@choate.com
jmarshall@choate.com

Investment Banker for the Debtors
Lazard Frères & Co., LLC
30 Rockefeller Plaza,
New York, NY 10112
Attn: Brandon Aebersold
Levi Quaintance
project.blue.rx@lazard.com

Buyer

Luke A. Barefoot

Kimberly Black

Michael Weinberg

Cleary Gottlieb Steen & Hamilton LLP

One Liberty Plaza, New York NY 10006

lbarefoot@cgsh.com

mdweinberg@cgsh.com

kblack@cgsh.com